

1 Lawrence J. Semenza, III, Esq., Bar No. 7174  
2 Email: ljs@skrlawyers.com  
3 Christopher D. Kircher, Esq., Bar No. 11176  
4 Email: cdk@skrlawyers.com  
5 Jarrod L. Rickard, Esq., Bar No. 10203  
6 Email: jlr@skrlawyers.com  
7 Katie L. Cannata, Esq., Bar No. 14848  
8 Email: klc@skrlawyers.com  
9 SEMENZA KIRCHER RICKARD  
10 10161 Park Run Drive, Suite 150  
11 Las Vegas, Nevada 89145  
12 Telephone: (702) 835-6803  
13 Facsimile: (702) 920-8669

14  
15 *Attorneys for Plaintiff Bridgett Dahl*

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 BRIDGETT DAHL,  
19 Plaintiff,  
20 v.  
21 JACOB MANDRUSIAK,  
22 Defendant.

23 Case No.: 2:18-cv-02225-APG-DJA

24 **STIPULATION AND ORDER TO  
CONTINUE SCHEDULED DEADLINES**

25 **(Fifth Request)**

26  
27 Plaintiff Bridgett Dahl ("Plaintiff") and Defendant Jacob Mandrusiak ("Defendant")  
28 (together, the "Parties"), by and through their respective counsel of record, hereby submit this  
Stipulation and Order to Continue Scheduled Deadlines Fifth Request (the "Stipulation"). The  
Parties first stipulated to extend the discovery deadlines, which was filed on March 13, 2019  
(ECF No. 10), and the Order granting said stipulation was filed on March 26, 2019 (ECF No.  
11). The Parties entered into a second stipulation for an extension of time on May 9, 2019 (ECF  
No. 13), and the Order granting said stipulation was filed on May 14, 2019 (ECF No. 16). The  
Parties entered into a third stipulation for an extension of time on August 13, 2019 (ECF No. 38),  
and the Order granting said stipulation was filed on August 14, 2019 (ECF No. 40). And most  
recently, the Parties entered into a fourth stipulation for an extension of time on August 27, 2019  
and the Order granting said stipulation was filed on August 28, 2019 (ECF No. 42).

1 On August 14, 2019, Defendant filed a Motion for Summary Judgment ("MSJ") (ECF  
2 No. 39). Presently, Plaintiff's response to Defendant's MSJ is due September 11, 2019. The  
3 Court has not set a hearing date on Defendant's MSJ. Plaintiff requires additional time to prepare  
4 the response to Defendant's MSJ as Plaintiff's lead counsel has been traveling for depositions and  
5 other members of his office just finished with trial. Plaintiff's lead counsel returned back to his  
6 office on September 3, 2019. Additionally, Plaintiff requires additional time to file a dispositive  
7 motion. Defendant has no objection and joins in the request. Therefore, the Parties request that  
8 the deadline to file dispositive motions be extended **one week** and the deadline for Plaintiff's  
9 response to Defendant's MSJ be extended **one week**.

10 The new deadlines would be as follows:

Event/Deadline	Current Date	New Date
<b>Dispositive motions</b>	September 6, 2019	September 13, 2019
<b>Response to Defendant's MSJ</b>	September 11, 2019	September 18, 2019
<b>Pre-Trial Order</b>	September 16, 2019	No change

16 Dated this 5th day of September, 2019.

Dated this 5th day of September, 2019

17 SEMENZA KIRCHER RICKARD

WILSON ELSER MOSKOWITZ EDELMAN &  
18 DICKER LLP

19 /s/ Jarrod L. Rickard

/s/ Jonathan C. Pattillo

20 Lawrence J. Semenza, III, Esq.

Michael P. Lowry, Esq.

Christopher D. Kircher, Esq.

Jonathan C. Pattillo, Esq.

21 Jarrod L. Rickard, Esq.

300 South 4th Street, 11th Floor

Katie L. Cannata, Esq.

Las Vegas, Nevada 89101

22 10161 Park Run Drive, Suite 150

Attorneys for Jacob Mandrusiak

Las Vegas, Nevada 89145

23 Attorneys for Plaintiff Bridgett Dahl

24 **IT IS SO ORDERED:**



25  
26 UNITED STATES MAGISTRATE JUDGE  
27  
28

September 6, 2019  
DATED: \_\_\_\_\_